

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America, Plaintiff, v. Dennis E. Hecker, Defendant.	Case No. 0:10-CR-32 (01) JNE/SRN DEFENDANT'S MOTION TO DISCLOSE AND MAKE INFORMANTS AVAILABLE FOR INTERVIEW
--	---

The defendant, DENNIS E. HECKER, by and through his attorney, Brian N. Toder, hereby moves the Court for an order requiring the government to disclose the following:

1. The names and addresses of any individuals that constitute informants and/or cooperating witnesses who are or were working with and/or were utilized by law enforcement officials in the above-captioned case;
2. Whether such individuals were alleged to have been active participants in the offenses charged in the indictment;
3. Whether such individuals are witnesses to the offenses charged in indictment;
4. Whether law enforcement officials followed internal guidelines in utilizing said individuals; and

5. The results of any suitability study and/or other internal documentation regarding the propriety of using said individuals as informants and/or cooperating witnesses.

The undersigned also moves that the Government be required to make such informants and/or cooperating witnesses available for interview.

This motion is based upon the indictment, the records and files in the above-entitled action, the concurrently filed memorandum, and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Respectfully submitted,

Dated: June 2, 2010

CHESTNUT CAMBRONNE PA

By /s/ Brian N. Toder

Brian N. Toder, #17869X
17 Washington Avenue North
Suite 300
Minneapolis, MN 55401
(612) 339-7300
Fax (612) 336-2940

Barbara J. May, #129689
2780 N. Snelling Ave.
Suite 102
Roseville, MN 55113

(651) 486-8887

Fax (651) 486-8890

ATTORNEYS FOR DEFENDANT